

IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

In re:	§	
	§	
TRAVIS RYAN YOUNG,	§	Case No. 17-30163-hcm
	§	
Debtor.	§	
_____	§	
	§	
PAMELA YOUNG,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 17-03010-hcm
	§	
TRAVIS RYAN YOUNG, Individually	§	
and d/b/a PREMIER BUILDERS,	§	
	§	
Defendant.	§	

**MOTION FOR EXTENSION OF DEADLINES UNDER SCHEDULING ORDER**

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

Comes now, Plaintiff, PAMELA YOUNG (hereinafter "Plaintiff"), by and through her attorneys, James & Haugland, P.C., and files this, her Motion for Extension of Deadlines Under Scheduling Order, and in support thereof would respectfully show the Court the following:

1. On February 3, 2017, Travis Ryan Young (hereinafter "Debtor") filed a Voluntary Petition for Relief under Chapter 7 of the Bankruptcy Code [Bankr. Doc. # 1].
2. On May 5, 2017, Plaintiff, a creditor of the Debtor, filed this adversary proceeding objecting to the discharge of the Debtor. [Adv. Doc. # 1].
3. Pursuant to the most recent Scheduling Order, the discovery deadline in the above adversary

proceeding is January 31, 2018.

4. On January 21, 2018, Plaintiff filed her Second Motion to Compel and for Sanctions Against Keith Young [Doc. #57] in this proceeding.
5. On January 21, 2018, Plaintiff filed her Second Motion to Compel and for Sanctions Against Brittany Young [Doc. #56] in this proceeding.
6. On January 21, 2018, Pamela Young filed her Third Motion to Compel and for Sanctions Against Debtor Travis Ryan Young in Bankruptcy Case Number 17-30163-hcm [Doc. #53].
7. On January 26, 2018, Travis Young filed his Motion to Compel Turnover of Property of the Estate Pursuant to 11 U.S.C. § 541(a) and 542(a) & (e) Against Former Counsel in Bankruptcy Case Number 17-30163-hcm-7 [Doc. #58].
8. On January 27, 2018, the Debtor filed his Motion to Compel Turnover of Property of the Estate Pursuant to 11 U.S.C. § 541(a) and 542(a) & (e) Against Former Counsel [Doc. #62] in this Adversary Proceeding.
9. All of the foregoing discovery motions are scheduled for hearing before this Court on February 13, 2018 at 10:00 a.m. in El Paso, Texas.
10. The parties have not completed discovery in this proceeding. In addition to the document production sought pursuant to the above Motions, Pamela Young still needs to take the depositions of Keith Young and Brittany Young in this adversary proceeding.
11. Because discovery is not yet complete in this adversary proceeding, the parties will not be able to submit a Joint Pre-Trial Order as required by the current Scheduling Order on March 14, 2018. Thus, it is probably unreasonable to expect that the parties will be ready to appear at docket call on March 21, 2018 at 1:30 p.m., as required by the current Scheduling Order.

12. Plaintiff requests that the Court take up the issue of a new Scheduling Order after the above February 13, 2018 hearings are conducted in the bankruptcy proceeding and the adversary proceeding. Thereafter, a new Scheduling Order needs to be entered in this adversary proceeding.
13. This Motion is not filed for delay or any improper purpose. Rather, this Motion is filed so that justice may be done.

**WHEREFORE, PREMISES CONSIDERED**, Plaintiff prays that the Court enter the Order attached as Exhibit "A" to this Motion and conduct a status hearing in the adversary on February 13, 2018 at 10:00 a.m. after hearing all of the other pending discovery motions in this case, and for such other and further relief to which Plaintiff may show herself to be justly entitled.

**SIGNED** this 31st day of January, 2018.

Respectfully submitted,

JAMES & HAUGLAND, P.C.  
P.O. Box 1770  
El Paso, Texas 79949-1770  
Phone: 915-532-3911  
FAX: (915) 541-6440

By: 

Corey W. Haugland  
State Bar No. 09234200  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I, Corey W. Haugland, hereby certify that on the 31st day of January, 2018 a true and correct copy of the foregoing Motion for Extension of Deadlines Under Scheduling Order was served on the following parties *via* electronic means as listed on the Court's ECF Noticing System:

Mr. Carlos A. Miranda, III  
Miranda & Maldonado, P.C  
5915 Silver Springs, Building 7  
El Paso, Texas 79902

A handwritten signature in black ink, appearing to read "C. W. Haugland", written over a horizontal line.

Corey W. Haugland

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**EXHIBIT**

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Scheduling Order filed herein by Plaintiff, Pamela Young. After reviewing the Motion, the Court finds that good cause exists to conduct a status hearing in this case after the conclusion of the discovery motions set in the bankruptcy proceeding and this adversary proceeding on February 13, 2018 at 10:00 a.m. It is therefore,

**ORDERED** that counsel for the Plaintiff and counsel for Defendant appear at the U.S. Bankruptcy Court in El Paso, Texas for hearing on February 13, 2018 at 10:00 a.m. in order to discuss Plaintiff's request for an extension of deadlines under the Scheduling Order. After conducting a hearing on the discovery motions and the Motion for Extension of Deadlines Under Scheduling Order, the Court will enter a scheduling order in this adversary proceeding which is appropriate.

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Submitted by:

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